### 2015 APR 27 AM 9: 15

Avista Corp.

1411 East Mission P.O. Box 3727 Spokane. Washington 99220-0500 Telephone 509-489-0500 Toll Free 800-727-9170

VIA: Electronic Mail

April 24, 2015

Jean D. Jewell, Secretary Idaho Public Utilities Commission P O Box 83720 Boise, ID 83720-0074

Dear Ms. Jewell:

Re: Case No. GNR-U-14-01

Dear Ms. Jewell:

Attached for filing with the Commission is an electronic copy of Avista Corporation's dba Avista Utilities ("Avista or the Company") "revised" filing in compliance with Commission Order 33229 in the above referenced Case No. to the following tariff sheets, I.P.U.C. No. 28:

"Substitute" Second Revision Sheet 70-g Canceling First Revision Sheet 70-g Canceling Canceling Original Sheet 70-h

The Company provides the following update regarding whether procedures or technologies exist that might enable instantaneously customer payment data as well as revised tariffs to support the changes in reconnection fees related to remote disconnect. Also included in this filing is the Company's updated Customer Education Plan.

Avista receives daily payment files from many sources:

- Kubra
- Western Union (Pay Station Payment Processor)
- U.S. Bank
- Fiserv

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- Banktech (Avista Remittance)
- Other smaller payment processors

Daily payment files are the files that include the actual financial transactions for payments made to Avista. These files are processed in Avista Customer Care and Billing (CC&B) system through a batch process that occurs Monday-Friday night. Banks and payment processors also use a batch process for submitting payment files to their payees. Because of the batch process it is standard industry practice for Avista to receive one payment file per business day.

Avista is able to process certain payments in real-time when they have cash or a check in hand. Examples of this are energy assistance payments made by Community Action Agencies. They submit checks to Avista for grants they have made and Avista's remittance department can manually apply these payments in real time. Avista receives 8,000-10,000 payments per day through the mail so it is not possible to process all of these payments manually each day. These payments run through a scanning and processing system and create one payment file per day to be processed through the nightly batch.

Avista does receive 30-minute payment data files throughout the business day from Kubra and Western Union. These include a list showing payments that have been made to Avista, however these files are not financial transaction files. The actual financial transaction is included on the daily payment file. These files are given to the Company's Distribution Dispatch department so they can determine if a payment has been made on an account before sending a serviceman to disconnect service. The challenge with the 30-minute payment file is some of the payments may be rejected or withdrawn<sup>1</sup>.

In summary, the 30-minute payment file is as near real time as the Company can get to receiving real time payment data. Because of the batch based systems and processes it would be a challenge to process financial transactions throughout the day or on a real time basis.

Regarding the concern that customers may be inadvertently disconnected even though they have made a payment, the Company has a process in place to address this. On the Company's past due and final notices, it directs customers to call the utility with receipt of payment in order to avoid disconnection. Also, the Company's website explains how long

<sup>&</sup>lt;sup>1</sup> Typically, there are up to 100 payments per day included on the 30-minute payment files that do not actually come through as a financial transaction because they were denied by the bank or payment processor.



payments take to post by each payment channel. This lets customers know that if they make a payment just prior to disconnection, they need to contact the utility to let them know a payment has been made on their account.

Attached is a copy of the Company's updated Education Plan as well as a strikeout/underline and clean tariff Schedules 70g and 70h.

Please direct any questions on this matter to myself at (509) 495-4975.

Sincerely,

Manager, Regulatory Policy

Link Gervis

Avista Utilities

<u>linda.gervais@avistacorp.com</u>

509-495-4975

Attachements



## Schedule 70g – Strike and Underline

I.P.U.C. No.28

Substitute Second First Revision Sheet 70-g

### AVISTA CORPORATION d/b/a Avista Utilities

### IDAHO RULES AND REGULATIONS - continued

#### 11. PAYMENTS: - continued

Company employees collecting payment at the customer's premises will not accept cash. If the customer offers payment in cash during a field collection visit, discontinuance of service will be postponed and the customer given the opportunity to either make payment at a designated payment agency or provide an alternative form of payment acceptable to the Company.

Monthly bills for services rendered and other charges are due and payable in full within 15 days from their date and if not so paid shall be in default. When a residential Customer certifies in writing that payment by the ordinary due date creates a hardship due to the particular date when the Customer receives funds, the due date shall be extended up to an additional 15 days.

In the event the Customer tenders a payment of less than the full amount of the monthly bill for services and/or other charges, the Company, unless otherwise directed by the Customer when payment is made, will apply said payment pro rata first to the charges in default and the remainder, if any, to the current monthly charges.

- 11.1 Returned Check Charge; Checks or payments remitted by Customers in payment of bills are accepted conditionally. A charge of \$20.00 will be assessed the Customer for handling checks or payments upon which payment has been refused by the bank.
- 11.2 Late Payment Charge; Payments not received by the next month's bill date will be considered late. A late payment charge will be applied to the delinquent amount and will be computed at the rate of 12 percent per annum or one percent per month. The late payment charge will not be applied to time-payment or equal payment accounts that are current.
- 11.3 Automatic Check Handling (ACH) Withdrawal Charge: When a Customer requests that the Company initiate a draft drawn on the Customer's financial institution, a charge of \$1.50 per draft will be assessed and billed to the Customer.

### 12. DEPOSITS:

See Utility Customer Relations Rules 100-109 110 and 601.

(Note: On April 20, 1999, an exception was granted to Rule 107.02, allowing the Company to credit deposits which are no longer required, including accrued interest, directly to customer accounts).

#### 13. DISCONTINUANCE OF SERVICE:

See Utility Customer Relations Rules 300-313 and 602-605.

#### 13.1 Field Collection Charge:

A personal visit performed by a Company representative to a service address subsequent to satisfying the provisions regarding Discontinuance of Service shall be deemed a field collection visit. A \$16.00 fee will be assessed for visits that result in the collection of past-due balances from the Customer during the visit. The fee will be waived if service is disconnected during the visit. The Customer will receive one free visit on a 12-month rolling basis.

### 14. <u>SERVICE</u> RECONNECTION AND <u>REESTABLISHMENT</u> CHARGES:

All applicable reconnection charges shall be paid before service is restored. Customer payments may be made to authorized Company employees or at a designated payment agency.

Issued April 24, 2015 Effective May 1, 2015

Issued by By Utilities By Norwood

Vice President, State & Federal Regulation

70-q

# Schedule 70g - Clean

### AVISTA CORPORATION d/b/a Avista Utilities

### IDAHO RULES AND REGULATIONS - continued

#### 11. PAYMENTS: - continued

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14. SERVICE RECONNECTION AND REESTABLISHMENT CHARGES:

All applicable reconnection charges shall be paid before service is restored.

Issued April 24, 2015

Effective

May 1, 2015

Issued by Avista Utilities

By

Avista Utilities

Kelly Norwood,

Vice President, State & Federal Regulation

### Schedule 70h - Strike and Underline

70-h

### AVISTA CORPORATION d/b/a Avista Utilities

### IDAHO RULES AND REGULATIONS - continued

#### 14. SERVICE RECONNECTION AND REESTABLISHMENT CHARGES: - continued

#### 14.1 Reconnection Charge:

When service has been discontinued for failure of the Customer to comply with the Company's rules and regulations under this tariff including default (nonpayment), a charge shall be made for reconnection. Satisfactory arrangements for payment must be made before service will be restored. The charge for reconnection shall be:

If a visit to the customer's premises is required to manually restore service, the charge for reconnection shall be:

\$24.00, provided satisfactory <u>payment</u> arrangements for payment of all proper charges have been made during the hours of 8:00 a.m. through 4:00 p.m. Monday through Friday, except holidays; or

\$48.00 if such arrangements are made during the hours of 4:00 p.m. through 7:00 p.m. Monday through Friday, except holidays.

If such arrangements are made during hours other than the above, the reconnection shall be completed on the following day except for medical emergencies or a customer disconnected in error. Any reconnection completed on a weekend or holiday will be charged \$48.00.

If the customer's service is restored remotely without visiting the customer's premises, the charge for reconnection shall be:

\$12.00 any day, any time, provided satisfactory payment arrangements have been made.

### 14.2 Electric Reestablishment Charge

When service has been discontinued at the Customer's request and then reestablished within a twelve-month period, the Customer shall be required to pay the monthly minimum charges that would have been billed had service not been discontinued, as well as a reestablishment charge. The charge for reestablishment shall be:

\$24.00, provided satisfactory <u>payment</u> arrangements for payment of all proper charges have been made during the hours of 8:00 a.m. through 4:00 p.m. Monday through Friday, except holidays; or

\$48.00 if such arrangements are made during the hours of 4:00 p.m. through 7:00 p.m. Monday through Friday, except holidays.

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Issued April 24, 2015 Effective May 1, 2015

By Avista Utilities Kelly Norwood,

## Schedule 70h - Clean

### AVISTA CORPORATION d/b/a Avista Utilities

### IDAHO RULES AND REGULATIONS - continued

### 14. SERVICE RECONNECTION AND REESTABLISHMENT CHARGES: - continued

#### 14.1 Reconnection Charge:

When service has been discontinued for failure of the Customer to comply with the Company's rules and regulations under this tariff including nonpayment, a charge shall be made for reconnection. Satisfactory arrangements for payment must be made before service will be restored.

If a visit to the customer's premises is required to manually restore service, the charge for reconnection shall be:

\$24.00, provided satisfactory payment arrangements have been made during the hours of 8:00 a.m. through 4:00 p.m. Monday through Friday, except holidays; or

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Issued April 24, 2015

Effective

May 1, 2015

Issued by Avista

Kelly Norwood,

#### Avista Idaho No-Knock Customer Education Plan

Per Commission Order No. 33229 filed in Case No. GNR-U-14-01, Avista is required to file a revised communication plan including at minimum:

- a. Before implementing the change in utility practices, provide field personnel and customer service representatives with additional training for handling customer questions and concerns; and
- b. Before implementing the change and for at least one (1) year thereafter:
  - i. Inform customers of the change when they contact the utility about a pastdue balance, a payment arrangement, where to make a payment, or a pending disconnection;
  - ii. Include a message about the change in the bills of customers with past due account balances and on the initial past-due notice and final disconnection notice; and
  - iii. Inform customers of the change when contacting them by phone before disconnection.

To meet the requirement set forth above Avista plans to do the following.

- 1. Provide Training to all Customer Service Representatives
  - a. Avista will include the changes to the disconnection notification process and the change to Reconnection charges in the knowledge base provided to representatives. This knowledge base, called the Flip Chart contains the Company's business processes and step-by-steps on how to perform transactions and tasks within its Customer Care and Billing system.
  - b. Include information about the changes in the April Customer Service employee meetings, which all Customer Service employees attend.
  - c. Modify its Credit & Collections training to include the changes.
  - d. Send out a process email on May 1<sup>st</sup> letting its representatives know the change is now in effect.
- 2. Provide Training to Field personnel
  - a. Collections training will be provided to Field personnel in March/April which will include information about the new changes.
- 3. When customers contact the utility regarding a past-due balance, payment arrangement, where to make a payment, or a pending disconnection representatives will educate customers that have a remote disconnect/reconnect device of the new policy that field personnel will not notify them in person at their service address prior to disconnection. In the future an alert will be added to a customer's account letting the Customer Service

Representative know that a remote disconnect/reconnect device is installed at the customer's address.

- 4. For customers that do not have a remote disconnect/reconnect device, the Company will follow its existing practice of notifying the customer at their service address prior to disconnecting service. The serviceman may accept payment at the door if they feel safe to do so.
- 5. For customers that have a new remote disconnect/reconnect device installed on their property, the Company continue its practice of leaving a door hanger (as it has done through its pilot program) letting the customer know that the device has been installed and that in the future the Company will not need to send a field representative to their service location to disconnect or reconnect service.
- 6. For customers that move into a location that already has a remote disconnect/reconnect device, the company will send a letter explaining the device is installed and that the Company will not notify them in person prior to shutting off service. The Company will create a monthly report to identify this subset of customers.
- 7. The Company will add a message to all past-due and final notices that states the following:

Important: If a remote disconnect/reconnect device is installed on your electric meter, we will not notify you in person at your service address prior to shutting off your service. Otherwise, a serviceman will notify you in person at you service address prior to shutting off you service and if they collect the total amount past due to prevent shut off, a charge may be assessed. Servicemen do not accept cash in Washington and Idaho.

8. The Company will add messaging to its website regarding the change in policy.



- <Date>
- <Customer Name>
- <Address>
- <City, State, and Zip Code>

Re: Remote Disconnect/Reconnect Device is installed on Your Electric Meter

Hello,

We see that you recently moved into the address listed above and wanted to make you aware that a remote disconnect/reconnect device is installed on your electric meter. This device allows Avista to disconnect or reconnect your service remotely, no longer requiring Avista personnel to visit your location for this purpose.

All bills and notices will continue to be delivered to you by mail or electronic mail. However, we no longer will accept payments at the door. To make a payment, you will need to utilize one of our other payment options such as; mail, our website, over the phone, at a pay station, through your bank, or at a drop box. For a full list of payment options and details please visit avistautilities.com.

If you have questions, please visit our website at avistautilities.com or call our customer service center at (800) 227-9187. We're available 7 a.m. to 7 p.m. Monday through Friday and Saturday 9 a.m. to 5 p.m.

Sincerely, Your Avista Customer Service Team



1-888-427-3403 www.avistautilities.com

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Your electric service was disconnected today. A device was installed on your electric meter to allow Avista to disconnect or reconnect your service remotely.

In the future, Avista will not need to send a field representative to your service location to disconnect or reconnect service. You will not have the opportunity to pay a field representative at your door to avoid disconnection. No notice will be left for you at the service location following disconnection. Avista will continue to send notices and attempt to contact you by telephone in advance whenever it intends to disconnect service. It is very important that you call Avista to make sure all your contact information, including telephone number, is correct. You may reach Avista at the number below.

1-888-427-3403 www.avistautilities.com

SEE REVERSE SIDE FOR IMPORTANTINFORMATION

The remote disconnect/reconnect device installed on your meter will allow Avista to reconnect service more quickly. When the reason for the disconnection (such as non payment of a past due bill) has been remedied, you will need to contact Avista to request reconnection. Your service will then be reconnected immediately by means of an electronic signal; you will not need to wait for a field representative to be sent to your service location. "If you have any questions or experience any problems at any point in the reconnection process, please contact Avista at the number below. We're available 7 a.m. to 7 p.m. Monday through Friday and Saturday 9 a.m. to 5 p.m.

#### Important:

If your service is shut-off, you will be required to pay the amount past due, a deposit, and a reconnect fee.

A medicalcertificate notifying Avista of a serious illness or medicalemergency may delay termination.

We are willing to make mutually satisfactory payment arrangements.

An informal or formal complaint concerning this action may be filed with the Idaho Public Utilities Commission - P.O.Box 83720, Boise, ID 83720-0074 Phone: (208) 334-0369 or toll free: (800) 432-0369.

1-888-427-3403 www.avistautilities.com

SEE REVERSE SIDE FOR IMPORTANTINFORMATION